September 15, 2005
In the Matter of
IP Enabled Services - Docket Number WC 04-36
E911 Requirements for IP Enabled Services - WC Docket Number 05-196

COMMENTS BY
THE 511 DEPLOYMENT COALITION

The 511 Deployment Coalition ("The Coalition") hereby responds to the Notice of Proposed Rulemaking ("NPRM") in the above proceeding[1] The Coalition offers comments regarding the NPRM and 511 services that are encumbered with similar issues to those of 9-1-1. This response concurs with the comments submitted by the National Emergency Number Association ("NENA") and The American Association of Poison Control Centers ("AAPCC"). Specifically with regard to the questions of: "whether the Commission should expand the scope and requirements of this Order" and "what the Commission can do to facilitate the development of techniques for automatically identifying the geographic location of users of this type of VoIP service."

COMMENTS

[1] 70 Federal Register 37307, June 29, 2005.

On July 21 2000, the FCC responded to a Petition by the United States Department of Transportation for assignment of an Abbreviated Dialing Code (N11) to access Intelligent Transportation Services Nationwide, (NSD-L-99-24) by assigning the 511 code as the national access number for Traveler Information Services. Since that time, 26 traveler information services available to over 80 million Americans are accessible using the 511 dialing code. Statistically, these systems average between 1.5 and 2 million calls per month (combined) using the 511 code. Many of these systems are statewide, meaning that one system is used to service the entire state (e.g. Virginia, North Carolina, Oregon, etc.), while others are regional by metropolitan area, and thus there is more than one 511 system in a state (e.g. Orlando , Tampa Bay and the greater Miami-Dade / Fort Lauderdale / West Palm Beach metropolitan areas). However, all systems are designed and coordinated as cross-carrier, so users may dial 511 and reach these traveler information services regardless of their telephone carrier (both landline and wireless).

A possible solution for 511 call routing, is to advertise the "back-door" number of their individual 511 system for use by VoIP customers. Though this does provide a method for VoIP users to access the information, these "back-door" numbers are different from state to state and system to system.

Thus, for this type of access for VoIP users, 511 deployers would "market" numerous 10-digit numbers for each 511 service and each service's "back-door" number being different. This situation is identical to the original reason for the US Department of Transportation's petition to the FCC, requesting the assignment of an "easy to remember" universal N11 code for traveler information.

Complying with the FCC mandate, VoIP providers and their vendors are implementing solutions for E9-1-1 provisioning. Some number of Short Term solutions are being researched and tested for 9-1-1 that utilize either a customers' self-entered location information, or the NPA-NXX of the calling party number. These solutions, however, rely on the customer registering their proper address, or using a phone number that is native to the area from which they are calling. However 511 callers can be mobile by nature, as the travel information they desire changes based on their location and destination. The above noted solutions do not account for a user who is a mobile, and might take their VoIP phone with them while traveling as they would a cell phone. Nor does it account for users who might have an out of area telephone number due to the differences in where they live and where their "office" is located (e.g. someone who lives in one state, but maintains an

office phone number from another).

Conclusion

For reasons stated above, with VoIP's nomadic nature and customer use of non-native numbers (VoIP customers that choose numbers not associated with the area in which they reside), traditional routing methods will likely not work. As national location determination processes and call routing schemes and regulations are created, we would encourage the FCC to consider that a call routing solution for future E9-1-1 should also be considered as a routing solution for the 511 dialing code, whose routing is geographically based..

Respectfully submitted,
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AASHTO

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